

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	No. 3:18-CR-97
	)	
v.	)	(JUDGE MARIANI)
	)	
ROSS ROGGIO, and	)	
ROGGIO CONSULTING Co, LLC.	)	
	)	
Defendants.	)	(Electronically Filed)

**BILL OF PARTICULARS**

The United States of America, by and through the undersigned Assistant United States Attorney, and pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that the following property is subject to forfeiture on the basis of the forfeiture allegations set forth in the Superseding Indictment filed in the above-styled criminal case. When the Superseding Indictment (Doc. 122) was filed, it referenced a list of assets to be attached that were not. The Government now submits this Bill of Particulars referencing those specific assets that the Government seeks to forfeit:

- (A) Real property located at 143 Indian Spring Drive, Stroudsburg, Monroe, County, Pennsylvania, Tax Map or Parcel ID Number 07/86262, current owner of record Ross William Roggio, former owner of record and estranged wife of Ross William Roggio, Kristy Merring-Roggio, with all

appurtenances, improvements and attachments thereon, legally described as:

ALL THAT CERTAIN lot, tract piece or parcel of land situate in the Township of Hamilton, County of Monroe, and Commonwealth of Pennsylvania, being described as follows, to wit:

Being Lot No. 13, Section Three, Indian Spring Farm, as shown on a plan of Indian Spring Farm (Section Three) prepared by J. Lavern Marshall drawn June 27, 1988, and recorded in the Office for the Recording Deeds, in and for the County of Monroe, at Stroudsburg, Pennsylvania, in Plot Book 61, Page 116.

- (B) Wells Fargo account #2089401166 titled ROGGIO CONSULTING COMPANY LLC with Ross W. Roggio as an authorized signer on the account;
- (C) Wells Fargo account #2089401158 titled ROGGIO CONSULTING COMPANY LLC with Ross W. Roggio as an authorized signer on the account;
- (D) 2015 BMW Model IS, VIN WBY2Z2C59FV392441 registered to Ross Riggio and Kristy Roggio;
- (E) 2015 Mercedes GL350 BLUETEC, VIN 4JGDF2EEFA606052 registered to Ross William Roggio;
- (F) Four Rolex watches seized from Ross William Roggio more fully described as:
  - 1. Rolex Oyster Perpetual Cosmograph "Daytona" 18K Rose Gold with a chocolate dial with a possible serial no. 4H2E2303;

2. Roles Geneve Cellini 18K Rose Gold with a black leather band and a black dial with a possible serial no. 50525 512F28Q1;
  3. Rolex Oyster Perpetual Day Date President with 18K Rose Gold and a possible serial no. H42V39543; and
  4. Rolex "Daytona" 18K Yellow Gold, Mother of Pearl and diamond dial with a possible serial no. 8Q0291C3.
- (G) Miscellaneous firearms, scopes, sights, bipods, magnifiers and other firearms accessories seized from Ross William Roggio:
1. Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0084;
  2. Lyman, Model 1878, 45/70 caliber, serial number #18780392;
  3. Item 44A - Scope Leopold S/N 325343AA with FDE Springfield Armory Model M1A 30 cal S/N 336481;
  4. Black Silencer Co Supp. Model Specwar 556 S/N SPW-11021;
  5. Item 29A- Scope - From Safe in Basement with Black Rifle w/wooden stock Norinco Rifle Model NDM-86 Cal 7.62x54 S/N 701300;

6. 6 Item 26A-Scope Truglo No S/N with Black Ruger with wooden stock Model 10/22 Cal .22 S/N 0005-51177;
7. Item 23A Eotech sight with Black CMMG 9mm short barrel rifle Model MK9 S/N SMT03019;
8. Item 22A Scope Leupold Mark 4scope S/N 161820AB with Black Sig Sauer Model MPX Pistol 9mm S/N 62B02121;
9. Long Gun: KMP Classic Arms, M1919A4, .30 caliber, Serial #757163 also #1711;
10. Silencer: Salvo 12, 12 gauge, Serial #SAL12-5198 Silencer co.;
11. Pistol: Colt, Commemorative Special Ops, .45 caliber, Serial #2778280;
12. Pistol: Desert Eagle, S0AE, .50 caliber, Serial #DK-0016164;
13. Item 76A: Scope VISM with Long Gun: Ruger, 10/22, .22 LR caliber, Serial #824-01532;
14. Long Gun: Ruger, 10/22, .22 LR caliber, Serial

#824-01532 with Item 76A: scope VISM;

15. Pistol: Heritage, Rough Rider, .22 caliber, Serial #C55366;
16. Pistol: Benelli, MP9SE, .22 LR caliber, Serial #09070B;
17. Long Gun: CAI, M1 Rifle, 30.06 caliber, Serial #M111778;
18. Item 72A scope with Long Gun: Moisen Magont, M91/30, 7.62x54 caliber, Serial #M9130S0361  
Item 72A scope;
19. Long Gun: Moisen Magont, M91/30T, 7.62x54 caliber, Serial #M9130S03614 with Item 72A scope;
20. Long Gun: Tikka, T-3, .308 Winchester caliber, Serial #059939;
21. Item 70A: Scope Nikon P-223 with Long Gun: Marlin Firearms Co, XT-22, .22 Mag caliber, Serial #MM31665B;
22. Long Gun: Marlin Firearms Co, XT-22, .22 Mag

caliber, Serial #MM31665B with Item 70A: Scope  
Nikon P-223;

23. Long Gun: Savage Arms, 340D, .222 Rem caliber,  
Serial #197304;
24. Long Gun: Remington, 870, 12 gauge caliber,  
Serial #RS77066G;
25. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0078;
26. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0079;
27. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0090;
28. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0044;
29. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0082;
30. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0086;
31. Long Gun: Armory, Armory-15, 5.56 caliber,

Serial #A0087;

32. Long Gun: Tactical Innovations Inc, T15BDX,  
5.56 caliber, Serial #86700667;
33. Long Gun: Armory, Armory-15, 5.56 caliber,  
Serial #A0085;
34. Long Gun: Armory, AR-15, 5.56 caliber, Serial  
#A0083;
35. Long Gun: Century Arms, Centurian 93 Sporter  
US, 5.56 caliber, Serial #C9315088;
36. Item 55A: Sight Mark red dot with Long Gun:  
Tactical Innovations, T15BDX, multi caliber,  
Serial #86700666;
37. Long Gun: Tactical Innovations, T1SBDX, multi  
caliber, Serial #86700666 with Item 55A: Sight  
Mark red dot;
38. Long Gun: Kris, Vector, .45 ACP caliber, Serial  
#45C016113;
39. Long Gun: Century Arms, Centurian 39 Sporter,  
7.62, 39 caliber, Serial #C39WM000661;

40. Long Gun: Romarm, WASR, 7.62 caliber, Serial #A132605-15R0 with Item 52A, Optics, Trijicon RX34;
41. Long Gun: Norinco, model: unknown, 5.56, 45 caliber, Serial #8451316952;
42. Long Gun: Izhmash, Saiga 410, 7.62x39 caliber, Serial #H04200381;
43. Long Gun: Century Arms, 70ABM, 7.62x39 caliber, Serial #WM02-000907;
44. Long Gun: Century Arms, M70-AB2 Sporter, 7.62 caliber, Serial #AB2C103045;
45. Long Gun: Fostech, model: unknown, 12 gauge caliber, Serial #0000465;
46. Item 46B: Bipod with Long Gun: Smith & Wesson, M&P 15-22, .22LR caliber, Serial #HBW5593;
47. Item 46A: Scope Firefield with Long Gun: Smith & Wesson, M&P 15-22, .22LR caliber, Serial #HBW5593;



48. Long Gun: Smith & Wesson, M&P 15-22, .22LR caliber, Serial #HBW5593 with Item 46A: Scope Firefield;
49. Item 45A: Optic, Trijicon RX34 with Long Gun: Heckler & Koch, SL8-1, .223 caliber, Serial #48007304;
50. Long Gun: Heckler & Koch, SL8-1, .223 caliber, Serial #48007304 with Item 45A: Optic, Trijicon RX34;
51. Long Gun: Kel Tech, RFB, 7.62 caliber, Serial #T2555;
52. Item 43A: Aimpoint Micro H-1 with Long Gun: Sturm Ruger, Ranch Rifle, 5.56 caliber, Serial #583-11246;
53. Long Gun: Sturm Ruger, Ranch Rifle, 5.56 caliber, Serial #583-11246 with Item 43A: Aimpoint Micro H-1;
54. Item 42B: Bipod, with Long Gun: Heckler & Koch, SL8-1, .223 caliber, Serial #48009484;

55. Item 42A: Scope, Leupold with Long Gun:  
Heckler & Koch, SL8-1, .223 caliber, Serial  
#48009484;
56. Long Gun: Heckler & Koch, SL8-1, .223 caliber,  
Serial #48009484 with Item 42A: Scope, Leupold  
1x9;
57. Long Gun: BFI, BACR, Mark 47, multi caliber,  
Serial #ACRD00647;
58. Item 40B: Optic, EOTECH Magnifier with Long  
Gun: CMMG Inc., Mark 47, 7.62x39 caliber,  
Serial #KWT02562;
59. Item 40A: Optic, EOTECH red dot with Long  
Gun: CMMG Inc., Mark 47, 7.62x39 caliber,  
Serial #KWT02562;
60. Long Gun: CMMG Inc., Mark 47, 7.62 x 39  
caliber, Serial #KWT02562 with Item 40A: Optic,  
EOTECH red dot;
61. Long Gun: PTR Industries, model: unknown, 3.08  
caliber, Serial #AW14102;

62. Item 38B: Optic EOTECH Magnifier with Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633;
63. Item 38A: Optic EOTECH Holigraphic with Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633;
64. Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633 with Item 38A: Optic EOTECH Holigraphic;
65. Item 37A: Optics Trijicon Reflex RX34 with Long Gun: FN Hertsal, SCAR, 5.56 caliber, Serial #LC32494;
66. Long Gun: FN Hertsal, SCAR, 5.56 caliber, Serial #LC32494 with Item 37A: Optics Trijicon Reflex RX34;
67. Item 36A: Optics EOTECH with Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0033;
68. Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0033 with Item 36A: Optics EOTECH;

- 69. Item 35A: Optics Trijicon Reflex RX34 with Long Gun: Tavor, SAR, 5.56 caliber, Serial #T0015911;
- 70. Long Gun: Tavor, SAR, 5.56 caliber, Serial #T0015911 with Item 35A: Optics Trijicon Reflex RX34;
- 71. Item 34B: Bipod with Long Gun: Remington, Model 700AAC-SD, .300 AAC Blackout caliber, Serial #RR76324C;
- 72. Item 34A: Scope Zeiss Terra with Long Gun: Remington, Model 700AAC-SD, .300 AAC Blackout caliber, Serial #RR76324C;
- 73. Long Gun: Remington, Model 700AAC-SD, .300 AAC Blackout caliber, Serial #RR76324C with Item 34A: Scope Zeiss Terra 3X;
- 74. Long Gun: Tavor, 5.56 caliber, Serial #T0055070;
- 75. Item 32A: Scope MSAR PN219 with Long Gun: MSAR, STG556, .223 caliber, Serial #600-P002734;
- 76. Item 31A: Optics, EOTECH with long Gun:

MSAR, XM17E4, .223 caliber, Serial #600-P012022;

77. Long Gun: MSAR, STG556, .223 caliber, Serial #600-P002734 with Item 32A: Scope MSAR PN219;
78. Long Gun: MSAR, XM17E4, .223 caliber, Serial #600-P012022 with Item 31A: Optics, EOTECH;
79. Item 30B: Optics - aimpoint with Pistol: Glock, 17, 9mm caliber, Serial #YBV536;
80. Item 30A: RONI Pistol carbine conversion with Pistol: Glock, 17, 9mm caliber, Serial #YBV536;
81. Pistol: Glock, 17, 9mm caliber, Serial #YBV536, Inside Item 30A: RONI Pistol carbine conversion;
82. Item 29B: Bipod with Long Gun: Sig Sauer, 7.62mm NATO caliber, Serial #22C013386;
83. Item 29A: Apex Scope with Long Gun: Sig Sauer, 7.62mm NATO caliber, Serial #22C013386;
84. Long Gun: Sig Sauer, model: MR556, 7.62mm NATO caliber, Serial #22C013386 with Item 29A:

Apex Scope;

85. Item 28A: Scope ACOG attached to Long Gun:  
Heckler & Koch, MR556, 5.56mm caliber, Serial  
#241202064;
86. Long Gun: Heckler & Koch, MR556, 5.56mm  
caliber, Serial #241202064 with Item 28A: Scope  
ACOG;
87. Pistol: Ruger, New Vaquero, 45 Colt caliber,  
Serial #SASS54920;
88. Item 26A Scope Leupold VX-R, Serial #  
186502AB with Long Gun: Springfield Armory,  
M1A, 7.62 Caliber, Serial #347037;
89. Long Gun: Springfield Armory, M1A, 7.62  
Caliber, Serial #347037 with Item 26A Scope  
Leupold VX-R, Serial #186502AB;
90. Item 25B Bipod with Long Gun: Barrett, 82A1,  
.50 Caliber, Serial #AA003811;
91. Item 25A Scope Leupold Mark 4 with Long Gun:  
Barrett, 82A1, .50 Caliber, Serial #AA003811;

92. Long Gun: Barrett, 82A1 .50 Caliber, Serial #AA003811 with Item 25A Scope Leupold Mark 4;
93. Item 24B -Bipod - with Long Gun: Weatherby, Mark 4, Caliber unknown, Serial #BW006739;
94. Item 24A Swarovski Z34-12x50 with Long Gun: Weatherby, Mark 4, Caliber unknown, Serial #BW006739;
95. Long Gun: Weatherby, Mark 4, Caliber unknown, Serial #BW006739 with Item 24A Scope Swarovski Z34-12x50;
96. Item 23A Scope Leupold VX-1 Serial #161831AC with Long Gun: RND, Edge .223 Caliber Serial #2931124;
97. Bipod - Item 23B with Long Gun: RND, Edge .223 Caliber Serial #2931124;
98. Long Gun: RND, Edge .223 Caliber Serial #2931124 with Scope Leupold VX-1 Serial #161831AC Item 23B;

99. Bipod - Item 21B with Long Gun: Armory, TAC  
338, .338 Lapua Mag Caliber Serial #TB30928;
100. Bipod - Item 20B with Long Gun: Armory, TAC  
338, .338 Lapua Mag Caliber Serial #TB30729  
Bipod - Item 20B;
101. Pistol: Heckler & Koch, 95K, 9mm caliber, Serial  
#215002826;
102. Pistol/Revolver: Ruger, New Vaquero .45 caliber,  
Serial #SASS54919;
103. Pistol/Revolver: Pietta, Cimmarron .45 Caliber,  
Serial #E38704;
104. Leupold Mark 4Scope Item 21A attached to Long  
Gun: Armory, TAC 338, .338 Lapua Mag Caliber  
Serial #TB30928;
105. Long Gun: Armory, TAC 338, .338 Lapua Mag  
Caliber Serial #TB30928 with Leupold Mark  
4Scope Item 21A;
106. Leupold Mark 4Scope Item 20A attached to Long  
Gun: Armory, TAC 338, .338 Lapua Mag Caliber



Serial #TB30729;

107. Long Gun: Armory, TAC 338, .338 Lapua Mag  
Caliber Serial #TB30729 with Leupold Mark  
4Scope Item 20A;
108. Pistol/Revolver: A. Uberti, 1873, model unknown,  
.45 Caliber, Serial #P37550;
109. Pistol/Revolver: Old Saybrook, Traditions 45 Colt  
caliber, Serial #E58949;
110. Pistol/Revolver: Filipietta, model unknown, .44  
Caliber, Serial #653026;
111. Pistol/Revolver: Ruger, New Vaquero .45 colt  
caliber, Serial #512-64623;
112. Pistol/Revolver: A. Uberti, 1873 .45 colt caliber,  
Serial #TC6294;
113. Pistol/Revolver: A. Uberti, Cimarron .45 colt  
caliber, Serial #P37551;
114. 6A Scope Hi-Lux Optics Serial #003175 attached  
to Long Gun: RRMW, Replica 1903, 30.06 Serial  
#3998129, 6A Scope Hi-Lux Optics Serial

#003175;

115. Item 3A Sight Mark Optics attached to Long Gun; Masterpiece Arms, Defender, 9mm caliber, Serial #B985076;
116. Pistol/Revolver: Old Saybrook CZ, Traditions 45 colt caliber, Serial #E57108;
117. Long Gun: Taurus, R92 .45 Colt caliber Serial #AM217918;
118. Long Gun: CZ-USA, Huglu Hammer Classic Shotgun, 12 Gauge Serial #15O3244.
119. Long Gun: Taurus, R92 .45 Colt caliber Serial #51T20531;
120. Long Gun: RRMW, Replica 1903, 30.06 Serial #3998129, 6A Scope Hi-Lux Optics Serial #003175;
121. Long Gun; DSA SA58 .308 Caliber Serial #DS41249;
122. Long Gun; FNH Scar 17S, 7.62x51mm Serial #HC43137;

123. Long Gun; Masterpiece Arms, Defender, 9mm caliber, Serial #FJ00408 with Item 3A Optics;
124. Long Gun; CZ-USA Scorpion EV0351 9x19mm Serial #EV0351;
125. Long gun; Sig Sauer, MPX 9mm Serial #62B023427;
126. FDE Springfield Armory Model M1A 30 cal S/N 336481 with Item 44A - Scope Leopold S/N 325343AA.
127. Black Advanced Armorment Corp Suppressor Model Cyclops 50 S/N 500330 in case;
128. FDE Surefire Suppressor SOCOM556 S/N A51N01332;
129. FDE Surefire Suppressor SOCOM556 S/N A51N01331;
130. Black SWR Suppressor Mod Specwar S/N SW762-2289;
131. Black Silencer Co Supp. Model Specwar 556 S/N SPW-11020;

132. Black Griffin Armament Suppressor Model  
RECCES S/N REC5-0027;
133. 1Black Silencer co Suppressor Specwar S/N SW-  
762-4578;
134. Black Griffin Armament Suppressor Model  
Recces S/N REC5-0026;
135. Black Griffin Armament Suppressor Model  
Spartan3 S/N SP3-0080;
136. Black YHM Suppressor Mod. Phantom M2 S/N  
Y19391;
137. Black YHM Suppressor Mod. Phantom M2 S/N  
Y17980;
138. Black TBAC Suppressor Model 3388A S/N 51491;
139. Black TBAC Suppressor Model 3388A S/N 51490;
140. Black Rifle w/wooden stock Norinco Rifle Model  
NDM-86 Cal 7.62x54 S/N 701300 with Item 29A-  
Scope - From Safe in Basement;
141. Black Armory AR-15 rifle Model Armory-15 .223  
cal S/N A0091 From Safe in Basement;

- 142. OD green P of USA AR-10 Rifle Model P-308 S/N  
12BA-13062 .38cal;
- 143. Black Ruger with wooden stock Model 10/22 Cal  
.22 S/N 0005-51177 with Item 26A- Scope Truglo;
- 144. Black Armory AR15 Rifle Model Armory-15 cal  
.223 S/N A0092;
- 145. Black Zenith firearms short barrel rifle Model  
MKEZ5RS 9mm S/N T0624-15BH01066;
- 146. Black CMMG 9mm short barrel rifle Model MK9  
S/N SMT03019 with Item 23A EOTECH sight  
attached;
- 147. Item 22B - Black Suppressor attached to item  
#22, Griffin Armament Suppressor Revolution  
9mm S/N REV9-0232.
- 148. Black Sig Sauer Model MPX Pistol 9mm S/N  
62B02121 with Item 22A Scope Leupold Mark  
4scope S/N 161820AB and Item 22B Black  
suppressor attached to item #22, S/N REV9-0232;
- 149. Black Zenith Firearms short barrel rifle Model

MKE25P 9mm S/N T0624-15BK00800;

150. Attached to Item #19 Black Advanced Armament

Corp. Suppressor Model element #2, S/N

E106548;

151. Black Walther Model P22 22cal S/N WA094850

with attached Item 20 Black Advanced

Armament Corp. Suppressor Model element# 2

S/N E106548;

152. Item 17A- Black Griffin Armament Suppressor

Revolution 9 S/N REV9-0294 with Black/Tan

Springfield Armory Model XD9 pistol S/N

MG436167 9mm;

153. Black/Tan Springfield Armory Model XD9 pistol,

caliber 9mm, S/N MG436167 9mm with Item 17A

Black Griffin Armament Suppressor Revolution 9

S/N REV9-0294;

154. Black Springfield Armory Operator 45 cal. pistol

S/N LW132150;

155. Black Glock Model 19 9mm pistol S/N ZFW272;

- 156. Black Colt Cobra 38 Spec. revolver S/N A73054;
- 157. Black Colt Python 357 mag. revolver S/N 82749E;
- 158. Black Colt Python 357 mag. revolver S/N K39803;
- 159. Black Colt Python 357 mag. revolver S/N 42376E;
- 160. Black Springfield Armory Champion Operator 45  
cal pistol S/N LW134249;
- 161. Black Berretta 92FS 9mm S/N BER678157;
- 162. Silver Colt Anaconda 44 mag revolver S/N  
MM48433;
- 163. Black Glock Model 17 9mm S/N YZA710;
- 164. Springfield Armory NRA 125th Anniversary #295  
of 525, model 1076, 45 cal. S/N N342895;
- 165. Silver Smith & Wesson pistol Model 1076, caliber  
unknown, serial: THB9323;
- 166. Black Silencer Suppressor Model Octane 45 HD  
S/N OCT45-5275;
- 167. Black Remington Model 1911 RI Pistol 45 cal.  
Serial: RHN39374A;
- 168. Black Glock Pistol Model 26 9mm S/N ZAN199;

and

169. Black Smith & Wesson Pro Series 45 cal. S/N

UCW6022.

Respectfully submitted,

GERARD M. KARAM  
UNITED STATES ATTORNEY

By: /s/Sean A. Camoni  
SEAN A. CAMONI  
Assistant U.S. Attorney  
235 N. Washington Avenue, Ste. 311  
Scranton, PA 18503  
Phone: 570-348-2800  
Fax: 570-348-2037  
sean.a.camoni@usdoj.gov



CERTIFICATE OF SERVICE

Pursuant to Standing Order 03-1 and Local Rules 4.2 and 5.7, I hereby certify that the foregoing document was served through electronic case filing on April 26, 2023.

Respectfully submitted,

JOHN C. GURGANUS  
UNITED STATES ATTORNEY

By: /s/Sean A. Camoni  
SEAN A. CAMONI  
Assistant U.S. Attorney  
235 N. Washington Avenue, Ste. 311  
Scranton, PA 18503  
Phone: 570-348-2800  
Fax: 570-348-2037  
sean.a.camoni@usdoj.gov